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CITY OF OAKLAND, Officer KATHERINE EVANS,

Officer ADAM HUMPHREY, Sergeant MICHAEL BEAVER,

Lieutenant CLIFFORD WONG and Lieutenant TONY JONES

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ESTATE OF MATTHEW CICELSKE, by and
through ANITA BARONE, as the personal
representative of the Estate, as well as on her own
behalf; minor children CAMERON CICELSKE
and ANTONIO CICELSKE, by and through their
guardian *ad litem*; JUSTIN OWENS; and
BENJAMIN CICELSKE,

Plaintiffs,

vs.

Oakland Police Officer KATHERINE EVANS (#
8895P); Officer ADAM HUMPHREY (# 8624P);
Sergeant MICHAEL BEAVER (# 8095);
Lieutenant CLIFFORD WONG (# 8196P);
Lieutenant TONY JONES (# 8026); the CITY OF
OAKLAND; and DOES 1-50, inclusive.

Defendants.

Case No. 13-cv-0379-JSC

**STIPULATION AND
~~PROPOSED~~ ORDER EXTENDING
DISCOVERY DEADLINES**

The parties, by and through their respective attorneys, stipulate and agree as follows.

Since a settlement conference in January 2014, the parties have deposed Oakland Police officer witnesses and civilian witnesses and have exchanged documents.

In order to preserve and further evaluate the testimony of additional witnesses for possible settlement and/or trial purposes, the parties need to undertake further additional discovery, including depositions of plaintiff parties and additional percipient witnesses. It is estimated that an additional eight (8) to ten (10) depositions, if not more, will need to be taken.

Due to counsels' workloads in other matters and availability issues with some percipient witnesses, efforts to comply with the current fact discovery deadline of June 6 will detrimentally affect both sides' case budgets and calendars and adversely impact settlement prospects and trial preparation. Accordingly, the parties jointly stipulate and propose that the following new schedule be ordered:

Fact Discovery Cut-Off: July 18, 2014

Expert Disclosure Deadline: July 31, 2014

Rebuttal Expert Disclosure Deadline: August 7, 2014

All other previously ordered dates remain unchanged.

Respectfully submitted,

Dated: June 4, 2014

/s/ Ben Rosenfeld
BEN ROSENFELD
Attorneys for Plaintiffs

Dated: June 4, 2014

LOZANO SMITH

/s/ William E. Simmons
WILLIAM E. SIMMONS
Attorneys for Defendants

Order

WHEREAS, good cause exists for the relief requested herein, the Court hereby makes the foregoing stipulation the order of the Court.

IT IS SO ORDERED

Dated: Lwp'7."4236

